

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

MOSAID TECHNOLOGIES INC., et al.

Plaintiffs,

V.

FREESCALE SEMICONDUCTOR, INC.,  
INTERPHASE CORPORATION,  
NVIDIA CORPORATION, ARM INC.,  
AND ARM LTD.

Defendants.

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No. 6:11-cv-00173-MHS

**AGREED MOTION TO DISMISS FREESCALE SEMICONDUCTOR, INC.  
AND INTERPHASE CORPORATION**

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and the terms of a separate agreement, the Plaintiff, MOSAID Technologies Inc. (“MOSAID”), and Defendants Freescale Semiconductor, Inc. (“Freescale”) and Interphase Corporation (“Interphase”) have agreed to settle all claims in the above-captioned action. MOSAID, Freescale, and Interphase, therefore, move this Court to dismiss the above-entitled cause and all claims by MOSAID, against Freescale, all claims by MOSAID against Interphase, all claims by Freescale against MOSAID and all claims by Interphase against MOSAID made therein with prejudice to the re-filing of same.

LSI Corporation (“LSI”) and Agere Systems LLC (“Agere”) contend that they are involuntary plaintiffs, are not parties to the settlement agreement and maintain that they have asserted no claims or causes of action against Freescale and/or Interphase and that, as a result, there are no claims or causes of action for LSI and Agere to dismiss. To the extent any claims or causes of action were alleged by Freescale and Interphase to have been asserted against them,

LSI and Agere agree these claims would also be dismissed with prejudice to the re-filing of same. Furthermore, all claims by Freescale against LSI and Agere, and all claims by Interphase against LSI and Agere made in this lawsuit are dismissed with prejudice to the re-filing of same, with the exception of Freescale's and Interphase's invalidity claims concerning United States Patent Nos. 5,577,230; 5,724,505; 5,958,036; 6,141,762; and 6,256,725, which are dismissed without prejudice.

MOSAID, LSI, Agere, Freescale, and Interphase further move the Court to order that all costs and expenses relating to this litigation (including attorney and expert fees and expenses) with respect to MOSAID, LSI, Agere, Freescale, and Interphase shall be borne solely by the party incurring same.

A proposed Order accompanies this motion.

**Agreed:**

Dated: February 25, 2013

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on February 25, 2013, all counsel who are deemed to have consented to electronic service are being served with a copy of this document by the Court's Electronic Filing System, under Local Rule CV-5(a)(3)(A).

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